

# BURGER GREEN & MIN LLP

Barbara Burger  
Nancy Green  
Richard Min  
Michael Banuchis  
Robert Arenstein, *Of Counsel*  
Brooke Camhi, *Of Counsel*

420 Lexington Avenue  
Suite 2834  
New York, New York 10170  
T. 212.681.6400  
F. 212.681.6999  
www.bgmlaw-nyc.com

May 13, 2019

**Via ECF**

Honorable Raymond J. Dearie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Porretti v. Baez*  
Case No. 19-cv-1955

Dear Judge Dearie,

I represent Respondent, Yanira Baez, in the above-referenced matter. This matter is scheduled for an appearance on May 14, 2019. Pursuant to the order to show cause issued by this Court, the subject Children are directed to appear in Court. It is respectfully requested that the Children, or at least the oldest Child, R.M.P.B., be excused from appearing. R.M.P.B. is scheduled to go on a field trip with her class to the 9/11 memorial and museum on that day.

Respondent has already turned over the passports for herself and the Children to my office. R.M.P.B. does not have any passports and the youngest child has an expired Mexican passport. Respondent has a valid U.S. passport. Respondent will be appearing on May 14<sup>th</sup> and the youngest child is also available. The oldest child will also appear if her appearance is not excused by this Court.

Thank you for your consideration and courtesy in this matter.

Respectfully Submitted,

*Richard Min*

Richard Min, Esq.

cc: Steven B. Ross, Esq. (via ECF)